

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

MAKSIM ZAITSEV,

Defendant.

No. CR 2:25-cr-00154-SPG

PROTECTIVE ORDER REGARDING
INFORMATION FROM PERSONNEL FILES

The Court has read and considered the parties' Stipulation for a Protective Order Regarding Information from Personnel Files, filed by the government and defendant Maksim Zaitsev ("defendant") in this matter on April 29, 2025, which this Court incorporates by reference into this order, and FOR GOOD CAUSE SHOWN the Court hereby FINDS AND ORDERS as follows:

1. The government's discovery in this case relates to defendant's alleged crime, that is, a violation of 18 U.S.C. § 111(a)(1), (b): Assault on a Federal Officer Resulting in Bodily Injury.

2. A protective order for the discovery is necessary to (a) allow the government to comply with its discovery obligations while protecting sensitive information from unauthorized dissemination,

1 and (b) provide the defense with sufficient information to
2 adequately represent defendant.

3 3. Accordingly, the discovery that the government will
4 provide to defense counsel in the above-captioned case will be
5 subject to this Protective Order, as follows:

6 a. As used herein, Protected Documents or Information
7 includes any information obtained from law enforcement personnel
8 records, including, but not limited to, complaints of official
9 misconduct. This definition applies retroactively to any personnel
10 records already produced in the course of this case.

11 b. The government is authorized to provide defense
12 counsel with Protected Information marked with the following legend:
13 "PROTECTED INFORMATION."

14 c. Use of the protected documents and the information
15 contain herein is limited to this criminal matter and, in
16 particular, said protected documents and the product of the same
17 shall not be utilized by the prosecuting agency, the defendant or
18 prosecution or defense of any other criminal or civil proceeding.

19 d. Under no circumstances shall the protected documents,
20 or the information contained therein, be retained, compiled, stored,
21 used as a data base, or disseminated, in any form, except for the
22 purposes of this criminal proceeding in accordance with this
23 protective order or by further order of the court.

24 e. Use of the protected materials and the information
25 contained therein is limited to authorized persons working for the
26 prosecution, the defense and the court on this specific criminal
27 matter.

1 f. If the protected material is included in any court
2 documents, those documents shall be submitted under seal.

3 g. In the event that any confidential police personnel
4 records are used in any court proceeding in this case, counsel shall
5 take all reasonable steps to maintain its confidentiality during such
6 use.

7 IT IS SO ORDERED.

8 May 1, 2025

9 DATE



HONORABLE SHERILYN P. GARNETT
UNITED STATES DISTRICT JUDGE

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11 Presented by:

12 /s/

13 RAHUL R.A. HARI
14 Assistant United States Attorney